

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS REGARDING JULY 24-25, 2019 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019 Omnibus Hearing* [Docket No. 7963] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in Courtroom 3 of the United

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico, and address, as necessary, the following matters:

- (a) *Motion of Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Objections to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico and Requesting Related Relief* [Case No. 17-3283, Docket No. 5589, Case No. 17-3566, Docket No. 386];
- (i) *Reply of Official Committee of Unsecured Creditors to Objections to Motion Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Objection to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Case No. 17-3283, Docket No. 6353, Case No. 17-3566, Docket No. 448];
- (ii) *Informative Motion of Official Committee of Unsecured Creditors Regarding its March 12, 2019 Motion [Docket No. 5589] Establishing Procedures with Respect to Objections to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico and Requesting Related Relief* [Case No. 17-3283, Docket No. 7352, Case No. 17-3566, Docket No. 551];
- (b) *Motion to Stay Contested Matters Pending Confirmation of Commonwealth Plan of Adjustment* [Case No. 17-3283, Docket No. 7640];

- (i) *Official Committee of Unsecured Creditors' Omnibus Objection to (A) Motion to Stay Contested Matters [Docket No. 7640 In Case No. 17-3283 (LTS)] and (B) Motion to Stay PBA Adversary Proceeding [Docket No. 99 In Adv. Proc. No. 18-149 (LTS)] Pending Confirmation of Commonwealth Plan of Adjustment [Case No. 17-3283, Docket No.7899];*
- (c) *Plaintiff Financial Oversight and Management Board for Puerto Rico's Motion to Stay PBA Adversary Proceeding Pending Confirmation of Commonwealth Plan of Adjustment [Adv. Case No. 18-00149, Docket No. 99]*
- (i) *Official Committee of Unsecured Creditors' Omnibus Objection to (A) Motion to Stay Contested Matters [Docket No. 7640 In Case No. 17-3283 (LTS)] and (B) Motion to Stay PBA Adversary Proceeding [Docket No. 99 In Adv. Proc. No. 18-149 (LTS)] Pending Confirmation of Commonwealth Plan of Adjustment [Adv. Case No. 18-00149, Docket No. 106];*
- (d) *Amended Motion of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect to Omnibus Objections to Claims of Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 2012 and 2014 and for Related Relief [Case No. 17-3283, Docket No. 7154];*
- (i) *Omnibus Reply of (I) Financial Oversight And Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors in Support of Motion Under Bankruptcy Code*

Sections 105(a) and 502 and Bankruptcy Rule 3007 to (A) Extend Deadlines and (B) Establish Revised Objection Procedures with Respect to Omnibus Objections to Claims of Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 2012 and 2014, and For Related Relief [Docket No. 17-3283, Docket No. 7583];

- (e) *Renewed Motion of The Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule 3007, Establishing Procedures With Respect to Omnibus Conditional Objection to Claims Filed or Asserted by The Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds [Case No. 17-3283, Docket No. 7814];*
- (i) *Response of Official Committee of Unsecured Creditors to Renewed Motion of Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to Establish Procedures With Respect to Omnibus Conditional Objection to Claims Filed or Asserted By Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds [Case No. 17-3283, Docket No. 7945];*
- (f) *Motion For Entry of an Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, (C) Approving Proposed Mailing, and (D) Granting Related Relief [Docket No. 7224];*
- (i) *Supplement to Motion for Entry of an Order Authorizing Alternative Dispute Resolution Procedures [Docket No. 7553];*

- (ii) *Limited Objection of Official Committee of Unsecured Creditors to Debtors' Motion For Entry of an Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, (C) Approving Proposed Mailing, and (D) Granting Related Relief* [Case No. 17-3283, Docket No. 7737];
- (g) *Motion of Retiree Committee Establishing Initial Procedures With Respect to Objections of The Official Committee of Unsecured Creditors and Official Committee of Retired Employees, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007 to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Case No. 17-3283, Docket No.7803; Case No. 17-3566, Docket No. 632];
- (i) *Limited Response of Official Committee of Unsecured Creditors to Motion of Retiree Committee Establishing Initial Procedures With Respect to Objections of Official Committee of Unsecured Creditors and Official Committee of Retired Employees, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007 to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Docket No. 632 In Case No. 17-3566 (LTS)] [Case No. 17-3283, Docket No.7949; Case No. 17-3566, Docket No. 647];
- (h) *Ambac Assurance Corporation's Motion and Memorandum of Law in Support of Its Motion Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds* [Case No. 17-3283, Docket No. 7176];

- (i) *Partial Joinder of Official Committee of Unsecured Creditors in Support of Opposition of The Commonwealth of Puerto Rico to Ambac Assurance Corporation's Motion Concerning Application of The Automatic Stay [Docket No. 7176] [Case No. 17-3283, Docket No.7831];*
- (i) *Ambac Assurance Corporation's Motion For Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [Case No. 17-3283, Docket No. 7507];*
- (i) *Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion Regarding Pension Liabilities Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7507] [Case No. 17-3283, Docket No. 7880];*
- (j) *Status Conference Regarding Orders Regarding Omnibus Motions By Official Committee Of Unsecured Creditors, Financial Oversight And Management Board, And Its Special Claims Committee To Extend Time For Service Of Summonses And Complaints and to Stay Certain Adversary Proceedings;*
- (k) Any objections, responses, statements, joinders, or replies to any of the foregoing;
and
- (l) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. John Arrastia and Jesus M. Suarez of Genovese Joblove & Battista, P.A. will also be attending, on behalf of the committee at the hearing in San Juan, Puerto Rico, and address, as necessary, the following matters:

- (a) *Joint Motion of Certain Adversary Defendants Seeking Entry of an Order Authorizing Participation in Determination of Constitutional Validity of Challenged Bonds* [Case No. 17-3283, Docket No. 7747];
 - (i) *Objection of The Official Committee of Unsecured Creditors to Joint Motion of Certain Adversary Defendants Seeking Entry of an Order Authorizing Participation in Determination of Constitutional Validity of Challenged Bonds* [Case No. 17-3283, Docket No. 7894];
- (b) *Urgent Motion for Stay of Adversary Proceeding Supplemental to Pending Motion to Stay GO Bond Proceedings Pending Confirmation of Commonwealth Plan of Adjustment* [Case No. 17-3283, Docket No. 7882];
 - (i) *Objection of The Official Committee of Unsecured Creditors to Urgent Motion for Stay of Adversary Proceeding Supplemental to Pending Motion to Stay GO Bond Proceedings Pending Confirmation of Commonwealth Plan of Adjustment* [Case No. 17-3283, Docket No. 8062];
- (c) *Status Conference Regarding Orders Regarding Omnibus Motions By Official Committee Of Unsecured Creditors, Financial Oversight And Management Board, And Its Special Claims Committee To Extend Time For Service Of Summonses And Complaints and to Stay Certain Adversary Proceedings;*
- (d) Any objections, responses, statements, joinders, or replies to any of the foregoing;
and
- (e) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

3. In addition, Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the hearing in San Juan, Puerto Rico.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: July 18, 2019

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas Ayala

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